

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No. 1:25-CV-376

LAMONT BURRELL, General
Guardian for Brenda Allen
Burrell,

Plaintiff,

v.

CHARLES JASON WILBORN, in
his individual and official
capacity, Person County Sheriff;
NEEKA SHAVONNE LAWSON,
in her individual and official
capacity, TRAVIS LEE
SLAUGHTER, in his individual
and official capacity, HARRIETT
SHAWN WAGSTAFF, in her
individual and official capacity,
and THE OHIO CASUALTY
INSURANCE COMPANY, as
Surety,

Defendants.

**MOTION FOR EXTENSION
OF TIME**

Defendants Charles Jason Wilborn, Travis Lee Slaughter, Harriett Shawn Wagstaff, and the Ohio Casualty Insurance Company (“Defendants”), by and through counsel, and pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, respectfully request an extension of

time up to and through July 15, 2025, to file their answer or otherwise plead to Plaintiff's complaint. In support for this Motion for Extension of Time, Defendants show the following:

1. Defense Counsel was not made aware of other service dates until recently, on the week of June 16, 2025, and his understanding was that Defendants were all served on or around May 27, 2025. According to Plaintiff's records, Defendant Wagstaff Slaughter was served on May 19, 2025, Defendant Slaughter was served on May 19, 2025, and Defendant Wilborn was served sometime earlier this week. The current deadline for Defendant Ohio Casualty Insurance Company to respond to the Complaint is July 10, 2025.

2. Defendants and their counsel need more time to gather the information necessary to respond to the factual allegations in the complaint. Counsel for Defendants have not yet been able to contact Defendants to assist with the Answer or other responsive pleading, and need more time to prepare the pleadings, respond to the allegations in the complaint, and review the underlying documents and video footage related to this action.

3. Good cause exists for the Court to grant this extension of time, and to the extent any Defendants were served prior to May 27, 2025, excusable neglect exists to grant the extension because Defense Counsel was not made aware of service and immediately requested Plaintiff's consent and filed this motion after he was made aware that service has been effectuated. The Defendants need more time to adequately and fully investigate the allegations in the Complaint to prepare a full Answer. Furthermore, Plaintiff consents to this extension of time.

4. Plaintiff consents to the extension of time requested herein.

5. This Motion for Extension of Time is not made for delay or any improper purpose and is made in good faith.

WHEREFORE, Defendants respectfully request an extension of time to file answer or otherwise plead up to and including July 15, 2025.

Respectfully submitted this the 20th day of June, 2025.

WOMBLE BOND DICKINSON (US) LLP

By: /s/ Brian F. Castro
Brian F. Castro
(N.C. State Bar No. 53412)
555 Fayetteville Street, Suite 1100
Raleigh, North Carolina 27601
Phone: (919) 755-8135
Fax: (919) 755-2150
Email: brian.castro@wbd-us.com

*Attorney for Defendants Charles Jason
Wilborn, Travis Lee Slaughter, Harriett
Shawn Wagstaff, and the Ohio
Casualty Insurance Company*

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send electronic notification of this Notice to those who have CM/ECF accounts, including Plaintiff's counsel.

This, the 20th day of June, 2025.

WOMBLE BOND DICKINSON (US) LLP

By: /s/ Brian F. Castro
Brian F. Castro
(N.C. State Bar No. 53412)
555 Fayetteville Street, Suite 1100
Raleigh, North Carolina 27601
Phone: (919) 755-8135
Fax: (919) 755-2150
Email: brian.castro@wbd-us.com

Attorney for Defendants Charles Jason Wilborn, Travis Lee Slaughter, Harriett Shawn Wagstaff, and the Ohio Casualty Insurance Company